

Sroka
09/639,961**REMARKS**

Applicant is grateful for the courtesy of a telephone interview with the examiner on Tuesday, April 26, 2005, at 10:00am. In accordance with the interview, and in response to the Office Action mailed February 15, 2005, claims 11, 13, 14, 17 and 20 are amended. Claims 11, 13, 14, 16, 17 and 20 are now active in this application, of which claims 11 and 20 are independent.

Based on the Claim Amendments and the following Remarks, Applicants respectfully request that the Examiner reconsider the outstanding objections and rejections and they be withdrawn.

Rejections Under 35 U.S.C. §102

In the Office Action, claims 8 - 20 have been rejected under 35 U.S.C. §102(a) for being anticipated by U. S. Patent No. 6,085,166 issued to Beckhardt et al ("Beckhardt"). This rejection is respectfully traversed.

For anticipation of a claim under 35 U.S.C. § 102, a single prior art reference must contain each and every limitation of the claim. *In re Bond*, 15 USPQ2d 1566 (Fed. Cir. 1990); *Constant v. Advanced Micro-Devices, Inc.*, 848 F.2d 1560, 1570 (Fed. Circ), cert. denied, 488 U.S. 892 (1988). As Beckhardt does not teach each and every limitation of any amended claim, Beckhardt does not anticipate pending claims 11, 13, 14, 16, 17 and 20, as amended.

Specifically, Beckhardt teaches an electronic calendar system with group scheduling that operates in a client/server environment and that includes the ability to automatically find available time for a meeting based on invitee availability. A name and address book is stored for users within a domain. One or more databases, associated with one or more servers, store profiles for potential invitees. The profiles include information regarding available and unavailable times

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for that potential invitee. A remote workstation includes a request generating system connected via a communications network to the server. The workstation generates a request for allocation of a time interval for one or more of the invitees. At the server, a busy time determination system gathers the profiles for the requested invitees using asynchronous fan out requests to the databases storing the profiles and determines whether those invitees are available during the requested time interval. Thus, the system automatically coordinates scheduling of invitees, where the invitees name/address (or equivalent information) resides on multiple servers.

The subject matter of the Beckhardt patent is actually quite different, as it does not relate to a network model database system and method. Many recited elements are not revealed by the Beckhardt patent. Beckhardt does not describe, teach or suggest a network model database schema as claimed in Applicant's subject application. While Beckhardt contemplates a networked computer system (i.e., a communications network), relational and hierarchical databases may be operable in a networked computer system. In contrast, Applicant's claimed system and methodology are directed to a network database which does not require a networked computer system, but may optionally operate in a networked environment. Additionally, Beckhardt provides no specific schema, much less a schema as taught and claimed in the subject Application. Furthermore, Beckhardt teaches neither primary branches nor a relationship branch as claimed by Applicant. Beckhardt also does not teach a record type that includes a context code and a phrase value, also as claimed by Applicant. Consequently, Beckhardt cannot handle multiple meanings of the same word because there is no Context. Beckhardt also cannot handle multiple languages. Moreover, Beckhardt does not teach a set that defines relationships from a record type to another record type.

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Applicant's network model database provides an alternative to conventional relational and hierarchical database models. Where the hierarchical model structures data as a tree of records, with each record having one parent record and many children, Applicant's network model allows each record to have multiple parent and child records, forming a lattice structure. The relational model differs by separating the logical design of the database from the physical design. Applicant's database model mandates fixed relationships between child and parent records, maintained internally by the database system, and allows access to data via access paths or pointers. More specifically, Applicant's claimed subject matter pertains to a specific design - schema - of a network model database system having 3 branches. As discussed above, the Beckhardt patent does not provide a schema of a database.

For clarification, Applicant has amended claim 11 to independent form, reciting three record types of Nouns, Verbs and Items, and requiring that each have a relationship with the other two, as conceptually depicted in Figures 7 and 8 of the subject Application.

Accordingly, Applicants respectfully request that the rejection over the claims be withdrawn.

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CHANGE OF CORRESPONDENCE ADDRESS

Kindly update the file for the referenced application to include the new address and telephone and fax numbers for Applicant's attorney, as follows:

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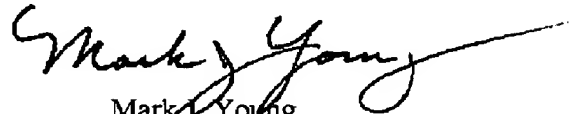
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CONCLUSION

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicant believes that a full and complete response has been made to the outstanding Office Action and, as such, the pending claims are in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,


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Date: May 16, 2005

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Attachment: Request for Continued Examination